

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

DANIEL GRAHAM,

Plaintiff,

v.

DEBT USA LLC,

Defendant,

Civil Action No: 1:22-cv-383

State Court Case No: J2-CV-22-001636

**DEFENDANT DEBT USA LLC'S
NOTICE OF REMOVAL**

Defendant Debt USA LLC (“Defendant”) files this *Notice of Removal* of this action from the Justice of the Peace Court, Precinct 2, Travis County, Texas to the United States District Court for the Western District of Texas, Austin Division as follows:

1. Plaintiff Daniel Graham (“Plaintiff”) filed his Complaint on April 11, 2022, in the Justice Court, Precinct 2, Travis County, Texas.
2. This is a civil action based on Plaintiff’s contentions that Defendant has violated the Telephone Consumer Protection Act (TCPA), 47 U.S. Code § 227, *et seq.* (“TCPA”).
3. Removal is proper because this case involves a federal question – alleged violations of the TCPA. Therefore, the suit is removable under 28 U.S.C. § 1441(a).
4. Removal is timely pursuant to 28 U.S.C. § 1446(b) because Defendant has filed this Notice of Removal within 30 days of receipt of Plaintiff’s Complaint.
5. Venue is proper in this district under 28 U.S.C. § 1441(a) because the state court where the suit has been pending is located in this district.

6. Pursuant to 28 U.S.C. § 1446(a) and LR 81, copies of all process, pleadings, orders and other papers filed in this action and obtained by Defendant, index of matters being filed and a list of all counsel of record, including addresses, telephone numbers and parties represented, are attached hereto and incorporated herein by reference.

7. Notice of this removal will be promptly filed with the Justice Court, Precinct 2, Travis County, Texas and be served on all adverse parties.

8. Plaintiff did not request a jury trial in state court.

For the above reasons, Defendant Debt USA LLC requests that this Court assume full jurisdiction over the proceeding as provided by law.

Dated: April 22, 2022

Respectfully submitted,

JAFFER & ASSOCIATES, PLLC

By: /s/ Shawn Jaffer

Shawn Jaffer

SBN. 24107817

Robert Leach

SNB. 24103582

5757 Alpha Rd. Suite 430

Dallas, TX 75240

T:(214) 494-1871

F:(888) 509-3910

Email: attorneys@jaffer.law

Attorneys for Defendant

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 22, 2022, a true copy of this Motion has been filed on CM/ECF and will be served on all parties in a manner approved by the Texas Rules of Civil Procedure.

/s/ Shawn Jaffer _____

Shawn Jaffer